

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	Case No.: 1:19-cr-00552-GHW
	:	
Plaintiff,	:	
	:	
v.	:	<b>NOTICE OF MOTION</b>
	:	
EDWARD SHIN,	:	
	:	
Defendant.	:	

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TO: Honorable Gregory H. Woods, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Assistant U.S. Attorney Tara LaMorte  
United States Attorney's Office  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007

Assistant U.S. Attorney Daniel Tracer  
United States Attorney's Office  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007

Sirs and Madam:

**PLEASE TAKE NOTICE** that on July 31, 2020 at 3:00 p.m. or at another time and date to be set by the Court, Defendant Edward Shin by his counsel Paul B. Brickfield, Esq. of Brickfield & Donahue will move for the following relief:

1. The provision of a bill of particulars;
2. The suppression of all evidence and fruits thereof obtained pursuant to the execution of the search and seizure warrant at Mr. Shin's office;
3. Early production of Jencks and Giglio material 60 days before trial;
4. Leave of Court to file additional motions based on the Government's continuing discovery obligations.

A Memorandum of Law and Certification of Paul B. Brickfield, Esq. pursuant to Local Criminal Rule 16.1 is submitted in support of this motion.

Respectfully Submitted,



Paul B. Brickfield, Esq.  
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/s/ Robert J. Basil, Esq.

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*Counsel for Defendant Edward Shin*

Dated: June 8, 2020